

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

OKLAHOMA FIREFIGHTERS PENSION &)
RETIREMENT SYSTEM, Individually And)
On Behalf Of All Others Similarly Situated,)

Plaintiff,)

v.)

Civil Action No. 1:14-cv-00108 (AJT/JFA)

K12 INC., NATHANIEL A. DAVIS,)
RONALD J. PACKARD, TIMOTHY L.)
MURRAY, HARRY T. HAWKS, and)
JAMES J. RHYU,)

Defendants.)

**STIPULATION AND PROPOSED
CASE MANAGEMENT PLAN AND SCHEDULING ORDER**

Oklahoma Firefighters Pension & Retirement System (“Lead Plaintiff”), as court-appointed Lead Plaintiff for the putative class, individually and on behalf of all others similarly situated, by and through its respective counsel, and Defendants K12 Inc., Nathaniel A. Davis, Ronald J. Packard, Timothy L. Murray, Harry T. Hawks, and James J. Rhyu (“Defendants”), by and through their respective counsel, hereby stipulate to the following Initial Case Management Plan and Scheduling Order for the above-captioned action:

WHEREAS, on January 30, 2014, Lead Plaintiff filed a complaint captioned *Oklahoma Firefighters Pension & Retirement System v. K12 Inc., et al.*, No. 14-CV-108, a putative class action under the Private Securities Litigation Reform Act of 1995 (“PSLRA”);

WHEREAS, on April 1, 2014, the Oklahoma Firefighters Pension & Retirement System filed a timely motion, and supporting papers, seeking appointment as Lead Plaintiff and for appointment of Lead and Liaison Counsel [Doc. Nos. 4-6] (the “Motion”). No other motions were filed and Lead Plaintiff’s Motion was unopposed.

WHEREAS, on April 25, 2014, this Court granted the Motion and appointed Oklahoma Firefighters Pension & Retirement System as Lead Plaintiff and approved its election of Bernstein Litowitz Berger & Grossmann LLP as Lead Counsel and Cohen Milstein Sellers & Toll PLLC as Liaison Counsel [Doc. No. 7];

WHEREAS, Lead Plaintiff intends to file an Amended Complaint;

WHEREAS, the parties believe that, for reasons of judicial efficiency and economy, Defendants should not be required to respond to the existing complaint, but rather should withhold responding to any complaint until after Lead Plaintiff has filed an Amended Complaint; and

WHEREAS, Defendants intend to file a motion to dismiss the Amended Complaint.

NOW THEREFORE, Lead Plaintiff and Defendants, by and through their respective counsel, agree and stipulate to the following:

1. Defendants shall not respond to any complaint in this action until after Lead Plaintiff has filed an Amended Complaint;
2. Lead Plaintiff shall file and serve an Amended Complaint on or before June 9, 2014;
3. Defendants shall file and serve their motion to dismiss the Amended Complaint on or before July 24, 2014;
4. Lead Plaintiff shall file and serve its Opposition to Defendants' motion to dismiss on or before August 25, 2014; and
5. Defendants shall file and serve any Reply in support of their motion to dismiss on or before September 9, 2014.

Respectfully Submitted: April 28, 2014

IT IS SO STIPULATED

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*Lead Counsel For the Class and Counsel for
Lead Plaintiff Oklahoma Firefighters Pension
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*Counsel for Defendants K12 Inc., Nathaniel A.
Davis, Ronald J. Packard, Timothy L. Murray,
Harry T. Hawks, and James J. Rhyu*

SO ORDERED.

DATED: _____, 2014

ANTHONY J. TRENGA
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of April, 2014, I electronically filed the foregoing Stipulation and Proposed Case Management Plan and Scheduling Order with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all registered users.

By: /s/ Stephen P. Barry

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